

Exhibit C

From: Golinveaux, Jennifer A.

Sent: Friday, March 22, 2019 3:50 PM

To: 'Jeff Gould' <Jeff@oandzlaw.com>; Anderson, Sean R. <SRanderson@winston.com>; Kearney, Thomas <TKearney@winston.com>

Cc: Kerry Mustico <Kerry@oandzlaw.com>; Matt Oppenheim <Matt@oandzlaw.com>; Elkin, Michael S. <MElkin@winston.com>; Buchanan, Tom <TBuchana@winston.com>; Lane, Thomas Patrick <TLane@winston.com>

Subject: RE: Sony v. Cox - deposition notice

Dear Jeff:

I write regarding Plaintiffs' Rule 30(b)(6) notice to Cox, which you sent after hours Wednesday night, March 20. You have noticed 49 detailed topics and have noticed the deposition to begin in just over a week on Monday, April 1, at your offices in Washington, D.C. First, as you know, Cox is headquartered in Atlanta, where all of the anticipated 30(b)(6) designees work and reside. We ask that you re-notice the deposition for Atlanta. Second, you have noticed the deposition to commence on April 1 with barely a week's notice and no advance notice or communication to us whatsoever. We currently anticipate designating approximately six witnesses to cover the 49 topics in your notice. As you may know, the week of April 1 is the spring break holiday from school for much of the country. Upon receipt of your notice Wednesday night, we have promptly checked availability with Cox's witnesses for that week. All but one are travelling for the spring break holiday and not available that week. Several will be out of the country. The individual who is in the office that week is checking to see if he could move things around to be available for deposition one day that week. We are checking availability the following two weeks for the other witnesses and will get back to you promptly.

Sincerely,
Jennifer

Jennifer Golinveaux

Winston & Strawn LLP

D: +1 415-591-1506

M: +1 415-699-1802

winston.com

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& STRAWN
LLP

From: Jeff Gould <Jeff@oandzlaw.com>

Sent: Wednesday, March 20, 2019 7:19 PM

To: Golinveaux, Jennifer A. <JGolinveaux@winston.com>; Anderson, Sean R. <SRanderson@winston.com>; Kearney, Thomas <TKearney@winston.com>

Cc: Kerry Mustico <Kerry@oandzlaw.com>; Matt Oppenheim <Matt@oandzlaw.com>

Subject: Sony v. Cox - deposition notice

Jennifer – Please see the attached Rule 30(b)(6) deposition notice to Cox. We would like to prioritize topics 1-10, 12-19, 22, 25-28, 33-36, and 38-41 in advance of the expert report deadlines and thus have noticed the deposition to commence on April 1, continuing from day to day thereafter. We would have served this notice sooner had we received Cox's documents sooner, and also note that critical documents still have not been produced (i.e. revenue/billing records). We are available to discuss scheduling, including identifying a mutually agreeable location.

Regards,
Jeff

Jeffrey M. Gould
Oppenheim + Zebrak, LLP
4530 Wisconsin Avenue, NW | Suite 500
Washington, DC 20016
202.851.4526 direct | 202.480.2999 main
jeff@oandzlaw.com | www.oandzlaw.com

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